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United States Court of Appeals  
For the District of Columbia Circuit

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Special Division

June 5, 2000

VIA US MAIL AND FACSIMILE

Honorable Carol Elder Bruce  
Independent Counsel  
c/o Marilyn Sargent, Deputy Clerk  
U.S. Court of Appeals  
District of Columbia Circuit  
333 Constitution Avenue, N.W.  
Washington, DC 20001

Re: Report References to Scott Dacey

Dear Ms. Bruce:

I am writing with regard to two excerpts on page 122 of your Report relating to my client Scott Dacey, that we believe are inaccurate and need to be either corrected or, at a minimum, supplemented with my client's recollection in the matter.

In specific, on page 122 of the text, Senator Russell Feingold of Wisconsin recalls a conversation with Mr. Dacey that supposedly occurred at a dinner on May 23, 1995. Not only does Mr. Dacey have no recollection of attending that dinner, a fact which a number of documents undoubtedly in the possession of the OIG bear out (see copies attached), but he unequivocally disputes Senator Feingold's account of the conversation which Mr. Dacey believes actually occurred after an event approximately a week earlier during a walk from the Rayburn House Office Building to the Senator's car.

On that occasion, Mr. Dacey outlined his client, the Oneida tribe's, interest in the Hudson issue. Mr. Dacey recalls Senator Feingold responding by stating that the proposal would not likely gain the support of Governor Thompson because Thompson opposed the expansion of gambling in Wisconsin. Mr. Dacey recalls explaining that the Governor had stated to individuals in Wisconsin who were working on the Hudson proposal that he could support the proposal if one of the three tribes involved in the Hudson effort would agree to close one of their existing